

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DANIEL UMPA, on behalf of himself and all )  
others similarly situated, )

Plaintiff, )

v. )

Case No. 4:23-cv-00945-SRB

THE NATIONAL ASSOCIATION OF )  
REALTORS, HOMESERVICES OF )  
AMERICA, INC., BHH AFFILIATES, LLC, )  
HSF AFFILIATES, LLC, THE LONG & )  
FOSTER COMPANIES, INC., KELLER )  
WILLIAMS REALTY, INC., COMPASS, )  
INC., EXP WORLD HOLDINGS, INC., EXP )  
REALTY, LLC, REDFIN CORPORATION, )  
WEICHERT REALTORS, UNITED REAL )  
ESTATE, HANNA HOLDINGS, INC, )  
DOUGLAS ELLIMAN, INC., DOUGLAS )  
ELLIMAN REALTY, LLC, AT WORLD )  
PROPERTIES, LLC, THE REAL )  
BROKERAGE, INC., REAL BROKER, LLC, )  
REALTY ONE GROUP, INC., )  
HOMESMART INTERNATIONAL, LLC, )

Honorable Judge Bough

Oral Argument Requested

Defendants. )

**DEFENDANT NATIONAL ASSOCIATION OF REALTORS'®  
MOTION TO JOIN AND DISMISS THE COMPLAINT**

Pursuant to Fed R. Civ. P. 12(b)(1) and (12)(b)(6), Defendant National Association of REALTORS®, by and through its undersigned counsel, moves this Court to dismiss the Complaint as to NAR with prejudice; and moves to join the Joint Motion to Dismiss, ECF 200 and 201, in this action. The Complaint fails to allege facts sufficient to show standing or to state a claim.

In support of this motion, NAR submits herewith its Suggestions in Support of its Motion to Dismiss, Declaration of Georgina Inglis, and accompanying supporting exhibits that are being submitted with those Suggestions.

Dated: February 26, 2024

Respectfully submitted,

/s/ Ethan Glass

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***Attorneys for Defendant NATIONAL  
ASSOCIATION OF REALTORS®***

**CERTIFICATE OF SERVICE**

I hereby certify that on February 26, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Ethan Glass

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